

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	
MICHAEL D. SCOTT)	Chapter 7
Debtor,)	
-----)	Case No. 17-70045-JAD
UNITED STATES OF AMERICA)	
Movant ,)	
)	Hearing:
vs.)	
)	Related to Doc. No.
MICHAEL D. SCOTT)	
)	
Respondent.)	

**UNITED STATES' MOTION TO EXTEND
TIME TO FILE OBJECTIONS TO DISCHARGE**

The United States of America, on behalf of the Internal Revenue Service ("IRS"), files this Motion to Extend Time to File Objections to Discharge, and in support thereof states as follows:

1. Debtor, Michael D. Scott, filed a Chapter 7 bankruptcy petition on January 24, 2017. Dkt. No. 1. Debtor filed his schedules on February 8, 2017.
2. IRS is listed as a creditor of debtor-respondent on his Petition.
3. According to the Notice of Chapter 7 Bankruptcy case, the deadline to object to debtor-respondent's discharge or to challenge dischargeability of certain debts is May 15, 2017.
4. The 341 Meeting of Creditors in this case is scheduled for May 16, 2017.
5. The United States is in the process of investigating Debtor's assets and the information Debtor provided on his schedules.
6. In order to make a proper determination regarding filing an objection to discharge, the United States is requesting additional time. After the review of debtor-

respondent's file is complete and creditors, including the United States, have the opportunity to question Debtor at the 341 Meeting, the United States may object to discharge in this case.

7. Accordingly, the United States respectfully requests that the Court grant a forty-five (45) day extension to complete the review and file an adversary complaint, if needed.

WHEREFORE, the United States of America respectfully requests that this Honorable Court issue an Order extending the deadline to file objections to discharge for forty-five days from the date the Order is entered.

May 12, 2017

Respectfully submitted,

SOO C. SONG
Acting United States Attorney

/s/ Jill Locnikar
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ORDER

AND NOW, to wit, this ____ day of _____, 2017 it is hereby ORDERED, ADJUDGED, and DECREED that the United States of America's Motion to Extend Time to File Objections to Discharge is GRANTED. The United States shall file an objection to discharge on or before forty-five (45) days of this Order.

BY THE COURT,

UNITED STATES BANKRUPTCY JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Motion for Extension of Time was served by electronic and/or first class mail, postage prepaid, this 12th of May, 2017, to and upon:

Michael David Scott
772 Saint Joseph St.
c/o FCI Loretto
Loretto, PA 15940

Trustee
James R. Walsh
Spence, Custer, Saylor, Wolfe &
Rose, LLC
1067 Menoher Boulevard
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Office of the United States Trustee
Liberty Center.
1001 Liberty Avenue, Suite 970
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Respectfully submitted,

SOO C. SONG
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/s/ Jill Locnikar

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